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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE
FITTINGS (“DIPF”) DIRECT
PURCHASER ANTITRUST
LITIGATION

Civ. No. 12-711 (AET)(LHG)

**DIRECT PURCHASER PLAINTIFFS’ NOTICE OF MOTION FOR
FINAL APPROVAL OF SETTLEMENTS**

PLEASE TAKE NOTICE THAT, on January 28, 2016 at 10:30 a.m., the undersigned attorneys for Direct Purchaser Plaintiffs (“DPPs”) in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order that provides for: (i) final approval by the Court of the Settlements between DPPs and SIGMA Corporation, and its owned subsidiary SIGMA Piping Products Corporation and between DPPs and Star Pipe Products, Ltd.; (ii) a determination that DPPs’ Notice Plan satisfied due

process requirements; (iii) approval of DPPs' Plan of Allocation; and (iv) granting such other relief as may be proper.

In support of this motion, DPPs rely upon the Memorandum of Law in Support of DPPs' Motion for Final Approval of Settlements with Defendants (i) SIGMA Corporation and its owned subsidiary SIGMA Piping Products Corporation; and (ii) Star Pipe Products, Ltd; the Declaration of Robert N. Kaplan in Support of DPP's Motion for Final Approval of Settlements; and the Declaration of Lori Castaneda Regarding Notice and Settlement Administration.

DATED: December 29, 2015

/s/ Joseph J. DePalma

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CERTIFICATE OF SERVICE

I, Joseph J. DePalma, hereby certify that on this day, a true and correct copy of Direct Purchaser Plaintiffs' Notice of Motion For Final Approval of Settlements; Memorandum of Law in Support of DPPs' Motion for Final Approval of Settlements with Defendants (i) SIGMA Corporation and its owned subsidiary SIGMA Piping Products Corporation; and (ii) Star Pipe Products, Ltd; the Declaration of Robert N. Kaplan in Support of DPP's Motion for Final Approval of Settlements; the Declaration of Lori Castaneda Regarding Notice and Settlement Administration; and two Proposed Forms of Order were electronically filed and served on all counsel of record via the Court's ECF system.

Dated: December 29, 2015

/s/Joseph J. DePalma
Joseph J. DePalma